

CLEMSON

UNIVERSITY

Ms. Tawanda S. Maignan
Emergency Response Team Leader
Minor Use and Emergency Response Branch
Registration Division
US EPA Office of Pesticide Programs
1200 Pennsylvania Ave., NW
Washington, DC 20460

March 13, 2017

Dear Ms. Maignan,

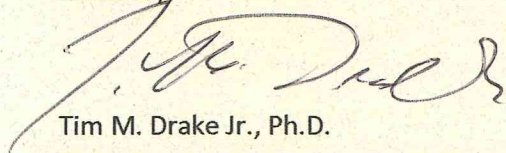
The Department of Pesticide Regulation, Regulatory and Public Service Programs at Clemson University, again supports a Section 18 Emergency Exemption for the use of Transform WG (50% sulfoxaflor) to control Sugarcane Aphid, *Melanaphis sacchari*, on grain sorghum in South Carolina during the 2018 season. Enclosed, please find a letter from Clemson University Extension requesting this use, along with a letter of support from Dow AgroSciences, and other supporting documents.

Dr. Francis Reay-Jones, Clemson University Extension Research Scientist, has indicated that the presence of *Melanaphis sacchari*, an invasive sugarcane aphid, in South Carolina constitutes an emergency situation for the state's grain sorghum crop again this year. The requested period of use for this product is from April 1, 2017 until November 30, 2017. This product is needed state-wide this year, so its proposed use will be in all 46 counties in SC. The estimated treated acreage for 2018 is 9,227 acres.

It is anticipated that the use of this product in established sorghum fields under Section 18 Emergency Exemption will have no adverse effects on endangered or threatened plant and animal species in South Carolina during the proposed period of application. There were no adverse effects reported to the Cooperative Extension Service, or to the Department of Pesticide Regulation resulting from the use of this product on 5,296 acres of sorghum in SC during the 2017 season.

If you should have any further questions regarding this request or need any other supporting information, please contact me. Please send all correspondence related to this request to Tim Drake, Assistant Director, Department of Pesticide Regulation, Clemson University, 511 Westinghouse Road Pendleton, SC 29670. Phone (864) 316-7503, tdrake@clemson.edu.

Sincerely,



Tim M. Drake Jr., Ph.D.
State Entomologist
Assistant Director
Department of Pesticide Regulation

